

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES, et al.,

Plaintiff,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, et al.,

Defendants.

Case No.: 1:16CV563 (PTG/WBP)

**DEFENDANTS' MOTION TO ALLOW INTO EVIDENCE DEPOSITION
TESTIMONY AND EXPERT REPORT OF UNAVAILABLE WITNESS
GEORGE C. CARUSO, CPM, RAM, SHCM, HCCP**

Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A.J. Dwoskin & Associates, Inc. (collectively, "Defendants") move this Court to allow into evidence at trial the deposition testimony and expert report of unavailable witness George C. Caruso, CPM, RAM, SHCM, HCCP ("Mr. Caruso"). Defendants are simultaneously filing a brief in support of this motion and a proposed order. Wherefore, Defendants ask this Court to enter the proposed order and allow into evidence at trial the deposition testimony and expert report of Mr. Caruso.

Dated: January 14, 2025

Respectfully submitted,
Waples Mobile Home Park Limited Partnership
Waples Project Limited Partnership
A.J. Dwoskin & Associates, Inc.
By Counsel

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CERTIFICATE OF SERVICE

I certify that, on January 14, 2025, I caused the foregoing document to be filed via the Court's CM/ECF system, which will send notice to all counsel of record.

/s/ Michael S. Dingman

Michael S. Dingman